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BROWNFIELDS & ECONOMIC INCENTIVES CONSULTING

DOCUMENTATION OF DUE CARE COMPLIANCE

24800 Haggerty Road | Farmington Hills, Michigan PM Project Number 01-6348-0-0002

Prepared for:

Luna Entertainment 42875 Grand River Avenue, Suite 201 Novi, Michigan 48375

Prepared by:

PM Environmental, Inc. 4080 West 11 Mile Road Berkley, Michigan 48072

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February 23, 2016

Mr. James Oegema Luna Entertainment 42875 Grand River Avenue, Suite 201 Novi, Michigan 48375

RE: Documentation of Due Care Compliance for the Former Sam's Club Property

Located at 24800 Haggerty Road, Farmington Hills, Michigan

Parcel ID: 22-23-19-326-056

PM Environmental, Inc. Project No. 01-6348-0-0002

Dear Mr. Oegema:

Enclosed is one copy of the Documentation of Due Care Compliance (DDCC) prepared by PM Environmental, Inc. (PM) in accordance with Section 21304c of P.A. 451, as amended.

THIS DOCUMENTATION OF DUE CARE COMPLIANCE WAS PERFORMED FOR THE EXCLUSIVE USE OF <u>OAKLAND COUNTY</u>, <u>LUNA ENTERTAINMENT</u>, <u>CVRS</u>, <u>L.L.C.</u> AND CELANI FAMILY LLC, EACH OF WHOM MAY RELY ON THE REPORT'S CONTENTS.

If you have any questions regarding the information in this report, please contact us at 248.336.9988.

Sincerely,

PM ENVIRONMENTAL, INC.

Aaron Snow Staff Scientist Jennifer Ritchie, CPG Regional Manager

Enclosure

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1.0 INTRODUCTION

This Documentation of Due Care Compliance (DDCC) was prepared on behalf of Celani Family LLC for the former Sam's Club property (Parcel ID: 22-23-19-326-056) located at 24800 Haggerty Road, Farmington Hills, Oakland County, Michigan 48335 (hereafter referred to as the "subject property"), in accordance with Section 20107a of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), P.A. 451 of 1994, as amended. Documentation, including this DDCC, is to be maintained demonstrating that the subject property is in compliance with Section 7a of Part 201. Documentation, which includes this report and related materials, must be made available to the Michigan Department of Environmental Quality (MDEQ) upon request.

Section 7a of Part 201 imposes the following obligations for contaminated properties:

- (a) Undertake measures as are necessary to prevent exacerbation.
- (b) Exercise due care by undertaking corrective action necessary to mitigate unacceptable exposure to regulated substances, mitigate fire and explosion hazards due to regulated substances, and allow for the intended use of the property in a manner that protects the public health and safety.
- (c) Take reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that foreseeably could result from those acts or omissions.
- (d) Provide reasonable cooperation, assistance, and access to the persons that are authorized to conduct corrective action activities at the property, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial corrective action activity at the property.
- (e) Comply with any land use or resources use restrictions established or relied on in connection with the corrective action activities at the property.
- (f) Not impede the effectiveness or integrity of any land use or resource use restriction employed at the property in connection with corrective action activities.

This DDCC is representative of the current and intended use as outlined in Section 1.1 and 1.2. If changes to the property use, zoning, operations, and/or layout occur, re-evaluation of potential exposure pathways and associated amendments to this report may be required.

1.1 Site Description and Background

The subject property consists of one parcel totaling 9.77 acres, and is located between Haggerty Road and I-275, north of Grand River Avenue (Figure 1). The subject property is developed with one single-story 104,583 square foot retail building, and is currently vacant (Figure 2). The remainder of the property primarily consists of asphalt and concrete paved areas.

Review of historical sources indicates the subject property was developed prior to 1940 with agricultural fields and a northeast trending irrigation ditch in the central portion of the subject property. Several small structures, which were likely associated with residential activities on the north adjoining property, were constructed in the northern portion of the subject property at

various times between 1940 and 1963 and demolished at various times between 1956 and 1974. Agricultural activities ceased and a residential dwelling was constructed in the southwestern portion of the subject property between 1956 and 1963. The northern portion of the subject property was utilized for automotive salvage operations associated with the north adjoining property between 1967 and 1974. A commercial building, which was occupied by a construction company, was constructed in the northwestern portion of the subject property between 1974 and 1980. Automotive salvage operations ceased, the buildings were demolished, and the irrigation ditches were filled between 1983 and 1989, and the current building was constructed in 1989.

1.2 Intended Use of the Subject Property

Celani Family LLC intends to redevelop the subject property for commercial purposes, which will include a motorcycle dealership and training facility, a restaurant, a drive-in movie theatre, and a grocery market. No significant chemical use and storage greater than household quantities are anticipated on the subject property. The subject property is currently zoned for B-3: General Business District, which is consistent with a Nonresidential property use.

The subject property is currently connected to municipal water, sanitary sewer, natural gas, electrical, and telecommunications utilities.

1.3 Summary of Previous Site Investigations

PM reviewed the following previous environmental reports completed for the subject property.

Name of Report	Date of Report	Company that Prepared Report
Phase I Environmental Site Assessment (ESA)	2-29-2008	Summit Environmental Services LLC (Summit)
Phase II ESA	10-10-2008	Summit and ECI Environmental Compliance (ECI)

Copies of the previous Phase I ESA and Phase II ESA completed in 2008 are included in Appendix C of PM's December 2015 Phase I ESA issued under separate cover.

The previous Phase I ESA was completed in 2008, at which time the subject property was occupied by Sam's Club. The 2008 Phase I ESA identified the following recognized environmental condition (REC):

• The north adjoining property was historically occupied by an automotive salvage yard from between 1967 and 1974 to between 1983 and 1989, which extended onto the northern portion of the subject property. The potential exists for spills, leaks, and/or dumping of general hazardous substances and/or petroleum products to have occurred on the subject property and to have negatively impacted the subsurface.

The 2008 Phase II ESA was completed to assess the above REC. Site assessment activities included the advancement of 10 soil borings (B1 through B6 and B9 through B12), the installation of 10 temporary monitoring wells (TMW1 through TMW6 and TMW9 through TMW12), and the collection of 10 soil samples and six groundwater samples for laboratory analysis of volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs), polychlorinated biphenyls (PCBs), and Michigan ten metals (arsenic, barium, cadmium, chromium, copper, lead,

mercury, selenium, silver, and zinc), or some combination thereof. A summary of soil and groundwater analytical results from the 2008 Phase II ESA is included in sections 2.1 and 2.2.

1.4 Summary of Current Site Investigation

1.4.1 2015 Phase I ESA

PM performed a Phase I ESA for the subject property dated December 11, 2015, in conformance with the scope and limitations of ASTM Practice E 1527-13 (i.e., the 'ASTM Standard'). A copy of PM's December 2015 Phase I ESA is included in Appendix A of PM's February 2016 Baseline Environmental Assessment (BEA), which was issued under separate cover.

The following onsite REC was identified in PM's December 2015 Phase I ESA:

• The north adjoining property was historically occupied by an automotive salvage yard from 1963 to 2000 with salvage operations extending onto the northern portion of the subject property from 1967 to 1989. Previous site investigations completed for the subject property in 2008 identified concentrations of 1,2,4-trimethylbenzene, naphthalene, and/or various metals in the soil and groundwater above the current Part 201 Residential and Nonresidential cleanup criteria in the northern portion of the subject property. Based on analytical results, the subject property is classified as a facility as defined by Part 201 of P.A. 451 of the Michigan NREPA, as amended.

No adjoining and/or nearby RECs were identified:

1.4.2 2016 Phase II ESA

PM completed a BEA (issued under separate cover) for the subject property dated February 15, 2016, to assess the REC identified in PM's December 2015 Phase I ESA. The BEA documented the subsurface investigation activities outlined below:

Prior to the commencement of field activities, MissDig, a utility locating service, was contacted to locate utilities on or adjacent to the subject property. Utilities were marked by the respective utility companies where they entered or were located adjacent to the subject property.

On January 27, 2016, PM conducted subsurface investigation activities at the subject property consisting of the advancement of ten soil borings (SB-1 through SB-10), the installation of five temporary monitoring wells (TMW-1, TMW-3, TMW-5, TMW-7, and TMW-9), and the collection of six soil samples and five groundwater samples for laboratory analysis of VOCs, PNAs, PCBs, and Michigan ten metals, or some combination thereof. Soil boring/temporary monitoring well locations are depicted on Figures 3 and 4.

1.5 Geology and Hydrogeology

Based on review of the soil boring logs, the soil stratigraphy generally consists of sand and/or clayey sand to approximately 14.0 feet below ground surface (bgs), underlain by clay to a depth of at least 20.0 feet bgs, the maximum depth explored. Perched groundwater was encountered in all 10 of the soil borings advanced at the subject property at depths between 5.0 and 11.0 feet bgs. Black soils were identified at SB-1, SB-2, and SB-7 at depths between 1.0 and 11.0 feet bgs. Additionally, wood debris was identified at SB-2 between 1.5 and 9.0 feet bgs.

Based on the absence of water wells in the area and the connection to municipal water, the drinking water exposure pathway is not complete. Therefore, the Drinking Water Protection (DWP) and Drinking Water (DW) cleanup criteria are not applicable to the subject property.

2.0 LOCATION OF CONTAMINATED MEDIA ON THE SUBJECT PROPERTY

PM compared the analytical results of soil and groundwater samples collected by Summit and ECI in 2008 and by PM on January 27, 2016 with the MDEQ Generic Cleanup Criteria and Screening Levels as presented in Part 201 Rules 299.1 through 299.50, dated December 30, 2013 entitled "Cleanup Criteria Requirements for Response Activity", in accordance with Section 20120a(1) using the Residential and Nonresidential cleanup criteria.

Figures 3 and 4, and Tables 1, 2 and 3 summarize the 2016 analytical results. Relevant figures and tables with analytical results from the 2008 Phase II ESA are included in Appendix A.

2.1 Summary of Soil Analytical Results

2.1.1 Summary of Previous Soil Analytical Results

Relevant figures and tables from Summit and ECI's 2008 Phase II ESA are included in Appendix A.

A concentration of 1,2,4-trimethylbenzene was detected in the 2008 soil sample collected from B3-1 (7.0 feet bgs) above the Part 201 Groundwater Surface Water Interface Protection (GSIP) cleanup criteria. No concentrations of VOCs were detected in any of the remaining soil samples collected in 2008 above laboratory method detection limits (MDLs).

A concentration of naphthalene was detected in the 2008 soil sample collected from B3-1 (7.0 feet bgs) above the Part 201 GSIP cleanup criteria. No concentrations of PNAs were detected in any of the remaining soil samples collected in 2008 above laboratory MDLs.

No concentrations of PCBs were detected in any of the 2008 soil samples collected above laboratory MDLs.

Concentrations of arsenic were detected in the 2008 soil samples collected from B2-1 (6.0 feet bgs), B3-1 (7.0 feet bgs), and B10-1 (5.0-6.0 feet bgs) above the Part 201 Residential and Nonresidential DWP, GSIP, and/or Residential Direct Contact (DC) cleanup criteria. Concentrations of mercury and selenium were detected in the 2008 soil sample collected from B3-1 (7.0 feet bgs) above the Part 201 GSIP cleanup criteria. Concentrations of various metals were detected in the 2008 soil samples collected from B2-1 (6.0 feet bgs), B2-2 (3.5 feet bgs), B3-1 (7.0 feet bgs), B4-1 (3.0-4.0 feet bgs), B5-1 (3.0-4.0 feet bgs) and B12-1 (7.0-8.0 feet bgs) above the Statewide Default Background Levels (SDBLs) for soils in Michigan, but below the most restrictive Part 201 Residential cleanup criteria. No concentrations of metals were detected in any of the remaining soil samples collected in 2008 above laboratory MDLs and/or SDBLs.

2.1.2 Summary of Current Soil Analytical Results

PM's January 2016 soil analytical results are summarized on Figure 3 and in Tables 1 and 2.

No concentrations of VOCs were detected in any of the soil samples collected above laboratory MDLs.

Concentrations of various PNAs were detected in the soil sample collected from SB-3 (4.0-5.0 feet bgs) above laboratory MDLs, but below the most restrictive Part 201 Residential cleanup criteria.

No concentrations of PCBs were detected in any of the soil samples collected above laboratory MDLs.

A concentration of arsenic was detected in the soil sample collected from SB-3 (4.0-5.0 feet bgs) above the Part 201 Residential and Nonresidential DWP, GSIP, and Residential DC cleanup criteria. Concentrations of barium, lead, and/or zinc were detected in the soil samples collected from SB-2 (2.0-3.0 feet bgs), SB-3 (4.0-5.0 feet bgs), SB-4 (3.0-4.0 feet bgs), SB-6 (2.0-3.0 feet bgs), and SB-8 (6.0-7.0 feet bgs) above SDBLs, but below the most restrictive Part 201 Residential cleanup criteria. No concentrations of metals were detected in any of the remaining soil samples collected above laboratory MDLs and/or SDBLs.

2.2 Summary of Groundwater Analytical Results

2.2.1 Summary of Previous Groundwater Analytical Results

Relevant figures and tables from Summit and ECI's 2008 Phase II ESA are included in Appendix A.

No concentrations of VOCs and PNAs were detected in the groundwater samples collected in 2008 above laboratory MDLs.

Concentrations of arsenic and/or lead were detected in all six of the 2008 groundwater samples collected (TMW1 through TMW5, and TMW12) above the Part 201 Residential and Nonresidential DW and/or Groundwater Surface Water Interface (GSI) cleanup criteria. No other concentrations of metals were detected in the groundwater samples collected in 2008 above laboratory MDLs and/or the most restrictive Part 201 Residential cleanup criteria.

2.2.2 Summary of Current Groundwater Analytical Results

PM's January 2016 groundwater analytical results are summarized on Figure 4 and in Table 3.

No concentrations of VOCs and PNAs were detected in the groundwater samples collected above laboratory MDLs.

Concentrations of arsenic were detected in the groundwater samples collected from TMW-1 and TMW-5 above the Part 201 Residential and Nonresidential DW and GSI cleanup criteria. Concentrations of arsenic, barium and/or zinc were detected in all five of the groundwater samples collected (TMW-1, TMW-3, TMW-5, TMW-7, and TMW-9) above laboratory MDLs, but below the most restrictive Part 201 Residential cleanup criteria. No other concentrations of metals were detected in the groundwater samples collected from the subject property above laboratory MDLs.

3.0 EXPOSURE PATHWAY EVALUATION

The following exposure pathways were evaluated, including: groundwater ingestion, soil leaching to groundwater, groundwater surface water interface, direct contact, and ambient and indoor air inhalation from contaminated soil and groundwater. Exposure pathways are eliminated when it

is demonstrated that unacceptable exposures do not exist and that response activities are not required to prevent or mitigate unacceptable exposures.

The subject property is currently zoned B-3: General Business District, which is consistent with a Nonresidential property use in accordance with Part 201. Therefore, the Part 201 Nonresidential cleanup criteria are applicable for the subject property's current zoning.

		HUMAN EXPOSURE PATHWA	AYS				
Pathway		Exposure Pathway Relevant?	If Pathway Is Relevant, Are Applicable Criteria Exceeded? (Nonresidential)				
	Yes/ No	Justification	Soil	Groundwater			
Groundwater Ingestion	No	Municipal waterNo water wells on the subject property	NA	NA			
Indoor Air Inhalation	Yes	No exceedance of the cleanup criteria	No	No			
Ambient Air Inhalation	Yes	No exceedance of the cleanup criteria	No	No			
Direct Contact	Yes	No exceedance of the Nonresidential DC cleanup criteria*	No	No			

NA - Not applicable

^{*} If changes to the property use, operations, and/or layout occur that would result in residential use, re-evaluation of potential exposure pathways and associated amendments to this report will be required.

07	THER PATHWAYS AND DUE CARE CONSIDERATIONS
Migration Via Utility Corridors	Utility corridors on or adjacent to the subject property may represent pathways for contaminant migration; Utility corridors may additionally act as a conduit for vapor and direct contact exposures to third parties completing subsurface work. Based on the lack of target analytes in exceedance of Part 201 Nonresidential SVII and DC cleanup criteria, no exposure is anticipated.
Fire and Explosion Hazards	No current compounds were identified above the flammability and explosively screening level and no non-aqueous phase liquid (NAPL) was identified.

4.0 PLAN FOR RESPONSE ACTIVITY

Concentrations of arsenic above the Part 201 Residential DC cleanup criteria have been documented in the 2008 soil sample collected from B2-1 (6.0 feet bgs) and the 2016 soil sample collected from SB-3 (4.0-5.0 feet bgs) in the northern portion of the subject property. However, no target analytes were identified above Part 201 Nonresidential cleanup criteria requiring response activities to prevent unacceptable exposure to hazardous substances for site occupants and onsite subsurface workers, based on the current and intended nonresidential use of the property. However, activities to comply with Section 7a, as outlined in Section 5.0 and 6.0, are still required.

The property is currently zoned for Nonresidential use; therefore, if changes to the property use, operations, and/or layout occur that would result in residential use, re-evaluation of potential exposure pathways and associated amendments to this report will be required.

5.0 CONSTRUCTION MANAGEMENT

Redevelopment of the property is anticipated; therefore, the following construction management actions will be conducted to prevent unacceptable exposure to hazardous substances for onsite subsurface workers and allow for the intended use of the subject property in a manner that protects the public's health and safety.

- All potential third party contractors who may work sub-grade on the subject property will be notified of the presence of soil contaminants and that site-specific health and safety plans and/or requirements for 40-hour personal protection and safety training are necessary if working in the impacted area of the subject property.
- Subject property workers will adhere to a site specific health and safety plan in accordance with OSHA 29 CFR 1910.120 Worker Protection Regulations, and will practice management actions for impacted soil on the subject property during construction related actions.
- Prior to any excavation or intrusive activity, including but not limited to the installation of building footings, sub-grade utilities, or other similar features, an evaluation of the potential hazardous substances in soil and groundwater will be under taken to assure protection of persons who may come into direct contact with contaminated soil and/or groundwater. Evaluation activities will include review of this DDCC, and available environmental reports.
- Contaminated soil and groundwater will not be relocated or removed from the subject property for proper disposal or moved from one portion of the subject property to another without proper characterization and/or appropriate notices in accordance with Section 20c of Part 201, and/or the use of engineering controls (i.e., liners, surface cover, etc.).
- In the event that previously unknown sources of contamination are discovered on the subject property during redevelopment and construction activities, an appropriate course of action will be implemented to evaluate the nature of the source, the extent of the contamination as feasible, and the appropriate course of action to prevent unacceptable exposure to subject property occupants and onsite workers, and prevent exacerbation of existing contamination. Unknown structures, such as USTs, drums or other containers will be evaluated for content and removed from the subject property, as appropriate.
- An environmental professional may be present during the construction activities.

6.0 EVALUATION AND DEMONSTRATION OF COMPLIANCE WITH SECTION 7AOBLIGATIONS

The following sections provide documentation that the proposed usage of the site will be in compliance with Section 7A obligations.

Concentrations of arsenic above the Part 201 Residential DC cleanup criteria have been documented in the 2008 soil sample collected from B2-1 (6.0 feet bgs) and the 2016 soil sample collected from SB-3 (4.0-5.0 feet bgs) in the northern portion of the subject property. Therefore, as indicated in Section 4.0, if changes to the property use, operations, and/or layout occur that would result in residential use, the surface cover will be maintained and include annual

inspections of the condition of the surface cover, which will consist of at least four inches of concrete or asphalt.

In the event the property owner or occupant intends to move soil, proper characterization is to be conducted to prevent movement of impact soils to un-impacted areas or offsite.

6.1 Exacerbation (Section 7a(1)(a))

Redevelopment activities are anticipated that could result in exacerbation if proper management activities are not completed. Activities outlined in Section 5.0 will be employed to control exposure during construction activities. Soil and/or groundwater in impacted areas will be characterized to allow proper management of contaminated media as identified. Soil control measures will be planned and implemented in a manner as to not increase offsite migration along subsurface utility, sewer, or structure corridors.

6.2 **Due Care (Section 7a(1)(b))**

Based on the current and anticipated use and analytical results, due care response activities will not be required to prevent unacceptable exposure for the intended use of the property. Activities outlined in Section 5.0 will be employed to control exposure during construction activities.

- If changes to the proposed property use, zoning, operations, and/or layout occur, reevaluation of potential exposure pathways and associated amendments to this report will be required.
- The subject property is currently connected to municipal water, but the owner will assure the groundwater on the property is not utilized for any purpose.

6.3 Reasonable Precautions (Section 7a(1)(c))

Reasonable precautions will be taken against the reasonable foreseeable acts or omissions of a third party and the consequences that are foreseeable could result from those acts or omissions. These include the following:

- All potential third party contractors who may work sub-grade on the subject property will be notified of the presence of soil and/or groundwater contaminants and that site-specific health and safety plans and/or requirements for 40-hour personal protection and safety training are necessary if working in the impacted area of the subject property. The owner will provide prospective future owners with the existing documentation, including this DDCC and the February 2016 BEA concerning the existing subsurface contamination.
- Activities outlined in Section 5.0 will be employed to control exposure during construction activities.

6.4 Reasonable Cooperation, Assistance, and Access (Section 7a(1)(d))

Reasonable cooperation, assistance, and access will be provided to the persons (i.e. including liable parties) that are authorized to conduct response activities at the facility, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial response activity at the facility.

6.5 Use Restriction Compliance (Section 7a(1)(e))

No land use or resource use restrictions are known or required in connection with the planned response activities at the property.

In the event that any land use or resource use restriction is placed on the property, the owner will comply with them.

6.6 Effectiveness or Integrity of Use Restrictions (Section 7a(1)(f))

As indicated in Section 6.5, no land use or resource use restrictions are known or required in connection with the planned response activities at the property.

If any land use or resource use restriction is placed on the property, the effectiveness and integrity of the land use or resource restrictions employed at the property will not be impeded.

7.0 DUE CARE DOCUMENTATION

Documentation, including this report, is to be maintained for the subject property, demonstrating that the subject property is in compliance with Section 7a of Part 201. This report and any requested compliance documentation must be made available to the MDEQ upon request. Compliance documentation includes, but is not limited to the following:

• Documentation of subsurface construction activities in impacted areas, including any soil or groundwater sampling/characterization reports and waste disposal manifests.

If you have questions regarding this report, please contact PM at 248.336.9988.

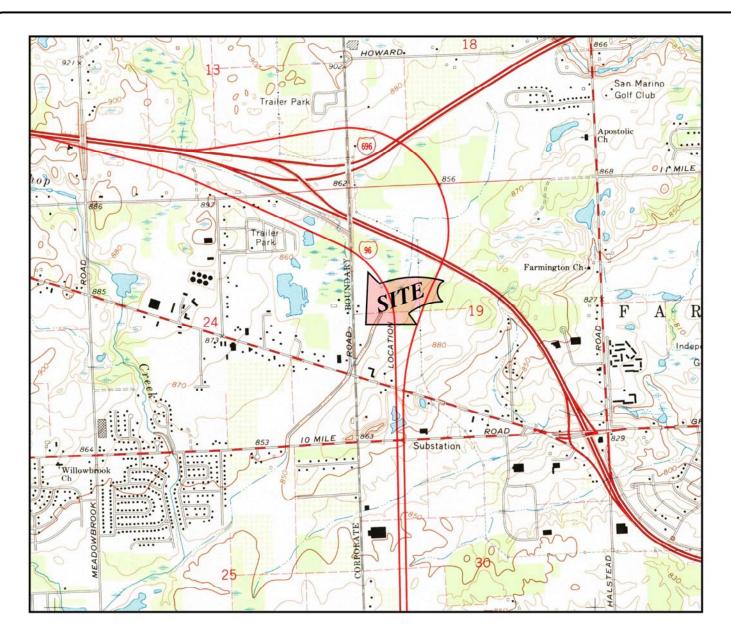
REPORT PREPARED BY:

REPORT REVIEWED BY:

Aaron Snow Staff Scientist Jennifer Ritchie, CPG Regional Manager

Figures





OAKLAND COUNTY



SCALE 1:24,000 MICHIC

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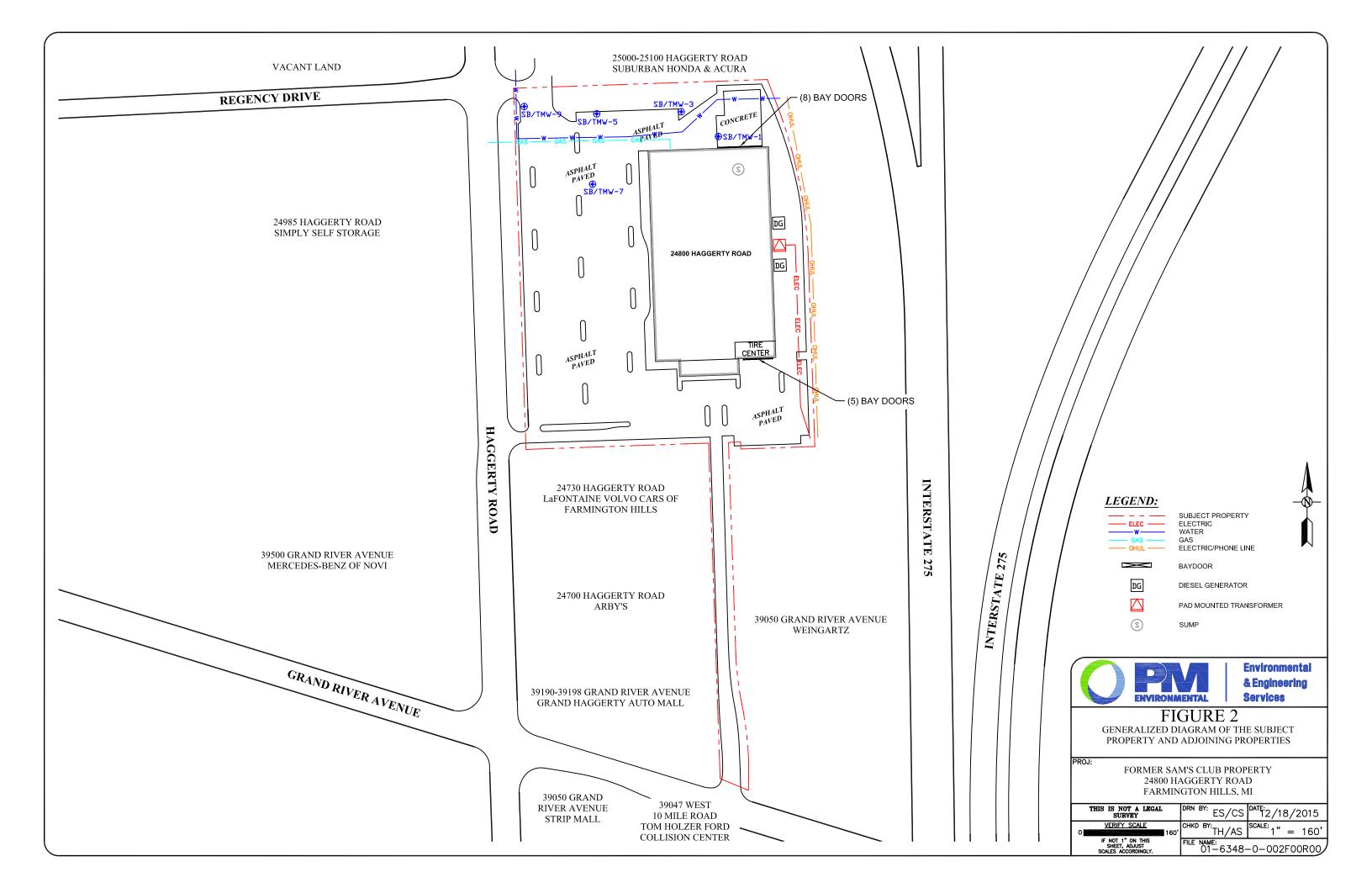
FIGURE 1

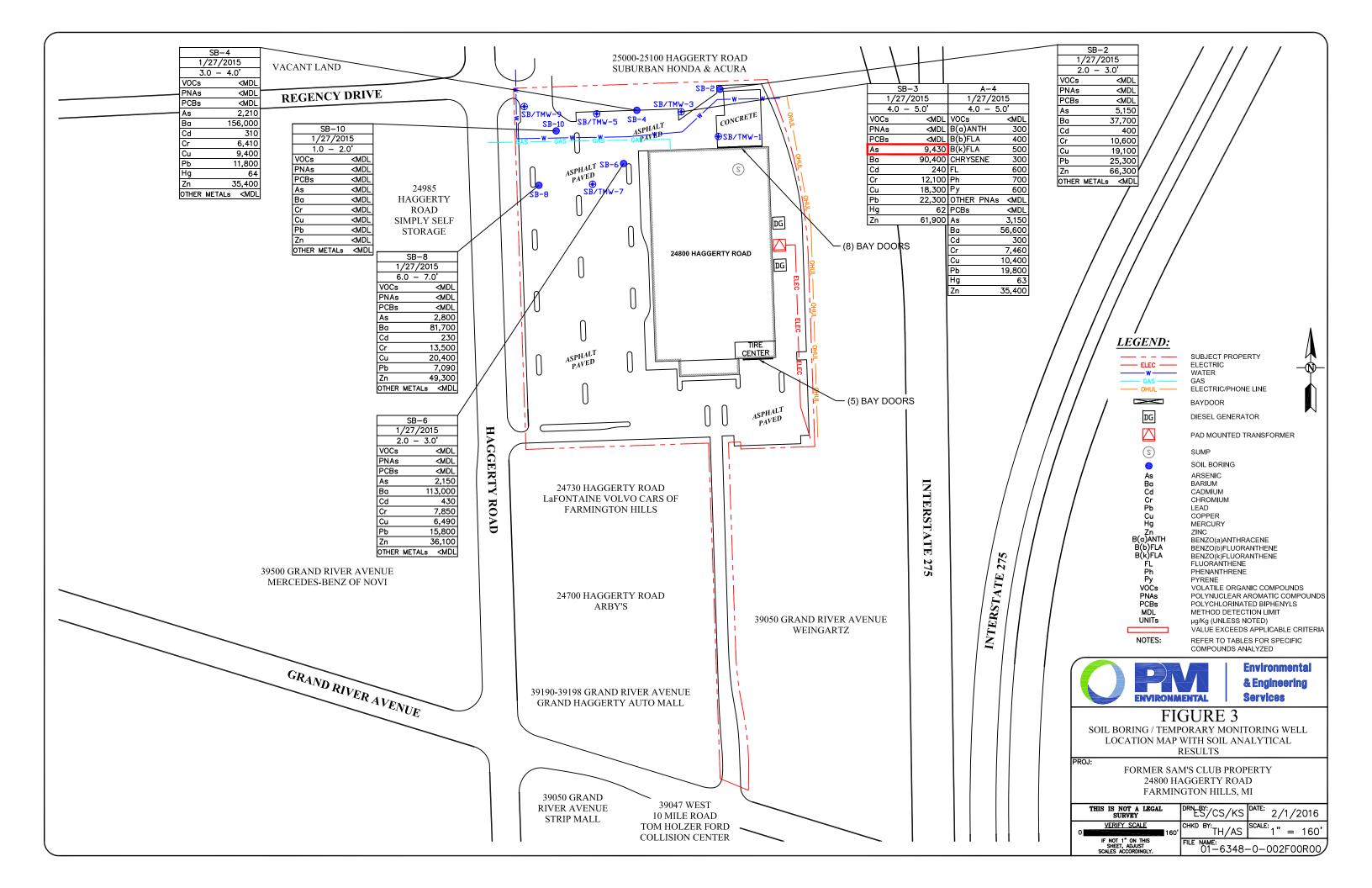
PROPERTY VICINITY MAP
USGS, 7.5 MINUTE SERIES
NORTHVILLE, MI QUADRANGLE, 1969. PHOTO REVISED 1971.

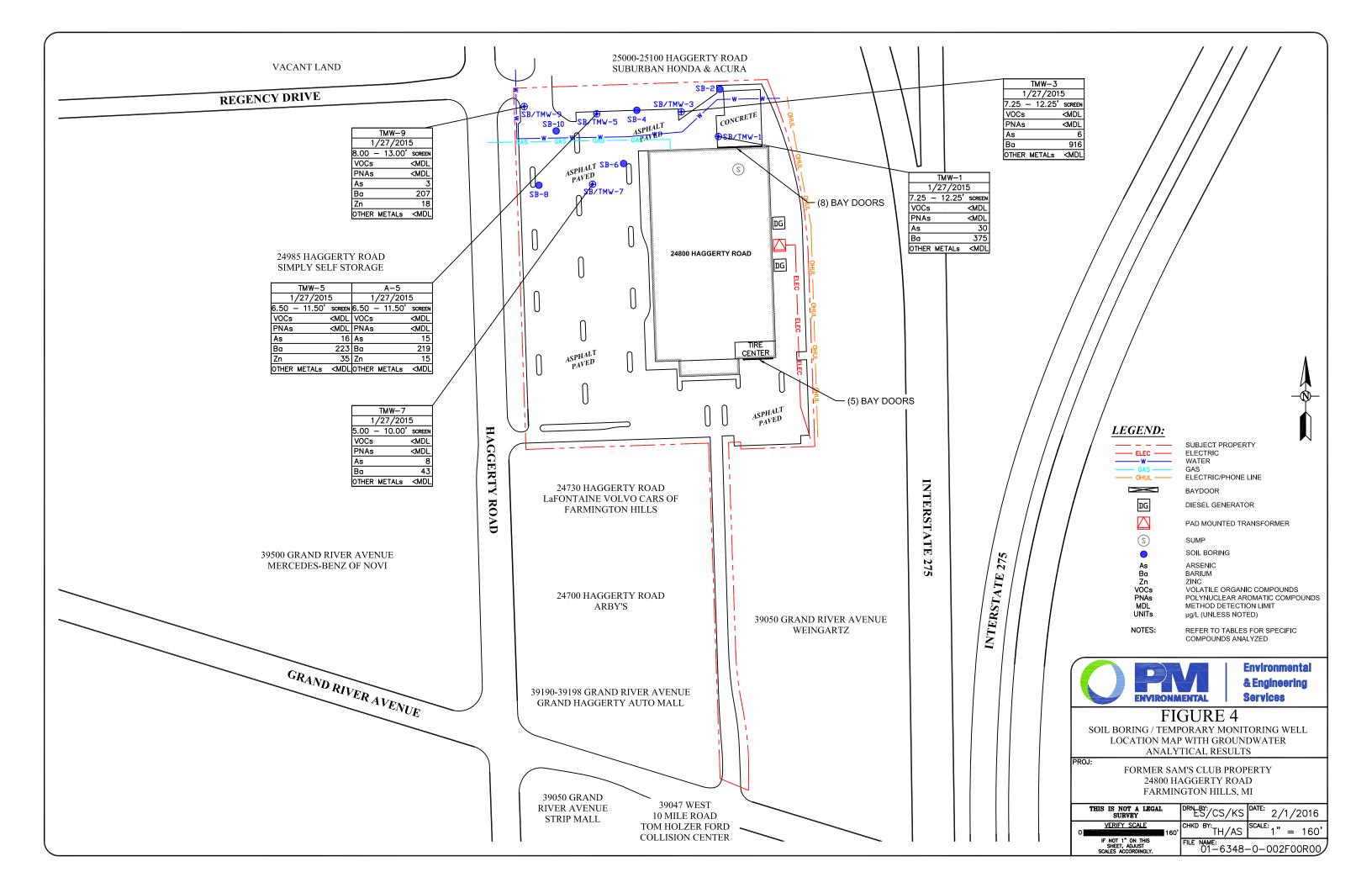


Environmental & Engineering Services PROJ: FORMER SAM'S CLUB PROPERTY 24800 HAGGERTY ROAD FARMINGTON HILLS, MI

THIS IS NOT A LEGAL SURVEY	DRN BY:	ES	DATE: 12,	/7/	/2015
2,000'	CHKD BY:	TH	SCALE: "	=	2,000'
IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	FILE NAME: 01-	6348	-0-00	2F	01R00







Tables



TABLE 1 SUMMARY OF SOIL ANALYTICAL RESULTS: VOCs, PNAs, AND PCBs 24800 HAGGERTY ROAD, FARMINGTON HILLS, MICHIGAN PM PROJECT # 01-6348-0-002

POLYNUCLEAR	ORGANIC COMPOUN AROMATIC HYDROCA HLORINATED BIPHEN (µg/Kg)	VOCs	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Fluoranthene	Phenanthrene	Pyrene	Other PNAs	PCBs	
Chemical A	Chemical Abstract Service Number (CAS#)				205992	207089	218019	206440	85018	129000	Various	1336363
Sample ID	Sample Date	Sample Depth (feet bgs)	VOCs	PNAs								
SB-2	01/27/2016	2.0-3.0	<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330
SB-3	04/07/0040		<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330
A-4 (Co-located SB-3)	01/27/2016	4.0-5.0	<mdl< td=""><td>300</td><td>400</td><td>500</td><td>300</td><td>600</td><td>700</td><td>600</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	300	400	500	300	600	700	600	<mdl< td=""><td><330</td></mdl<>	<330
SB-4	01/27/2016	3.0-4.0	<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330
SB-6	01/27/2016	2.0-3.0	<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330
SB-8	01/27/2016	6.0-7.0	<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330
SB-10	01/27/2016	1.0-2.0	<mdl< td=""><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><300</td><td><mdl< td=""><td><330</td></mdl<></td></mdl<>	<300	<300	<300	<300	<300	<300	<300	<mdl< td=""><td><330</td></mdl<>	<330

Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50)

Generic Soil Cleanup Criteria Tables 2 and 3: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 30, 2013

MDEQ Guidance Document For The Vapor Intrusion Pathway, Policy and Procedure Number: 09-017, Appendix D Vapor Intrusion Screening Values, May 2013													
		Resid	ential (µg/Kg)									
Drinking Water Protection (Res DWP)	Various	NLL	NLL	NLL	NLL	7.30E+05	56,000	4.80E+05	Various	NLL			
Groundwater Surface Water Interface Protection (GSIP)	Various	NLL	NLL	NLL	NLL	5,500	2,100	ID	Various	NLL			
Soil Volatilization to Indoor Air Inhalation (Res SVII)	Various	NLV	ID	NLV	ID	1.0E+9 {D}	2.8E+06	1.0E+9 {D}	Various	3.0E+06			
Ambient Air Infinite Source Volatile Soil Inhalation (Res VSI)	Various	NLV	ID	NLV	ID	7.40E+08	1.6E+05	6.5E+08	Various	2.40E+05			
Ambient Air Finite VSI for 5 Meter Source Thickness	Various	NLV	ID	NLV	ID	7.4E+08	1.6E+05	6.5E+08	Various	7.9E+06			
Ambient Air Finite VSI for 2 Meter Source Thickness	Various	NLV	ID	NLV	ID	7.4E+08	1.6E+05	6.5E+08	Various	7.9E+06			
Ambient Air Particulate Soil Inhalation (Res PSI)	Various	ID	ID	ID	ID	9.3E+09	6.7E+06	6.7E+09	Various	5.2E+06			
Direct Contact (Res DC)	Various	20,000	20,000	2.00E+05	2.0E+06	4.6E+07	1.6E+06	2.9E+07	Various	{T}			
		Nonres	idential (µg/l	(g)									
Drinking Water Protection (Nonres DWP)	Various	NLL	NLL	NLL	NLL	7.30E+05	1.60E+05	4.80E+05	Various	NLL			
Soil Volatilization to Indoor Air Inhalation (Nonres SVII)	Various	NLV	ID	NLV	ID	1.0E+9 {D}	5.1E+06	1.0E+9 {D}	Various	1.6E+07			
Ambient Air Infinite Source Volatile Soil Inhalation (Nonres VSI)	Various	NLV	ID	NLV	ID	8.9E+08	1.90E+05	7.8E+08	Various	8.10E+05			
Ambient Air Finite VSI for 5 Meter Source Thickness	Various	NLV	ID	NLV	ID	8.8E+08	1.90E+05	7.8E+08	Various	2.8E+07			
Ambient Air Finite VSI for 2 Meter Source Thickness	Various	NLV	ID	NLV	ID	8.8E+08	1.90E+05	7.8E+08	Various	2.8E+07			
Ambient Air Particulate Soil Inhalation (Nonres PSI)	Various	ID	ID	ID	ID	4.1E+09	2.9E+06	2.9E+09	Various	6.5E+06			
Direct Contact (Nonres DC)	Various	80,000	80,000	8.00E+05	8.0E+06	1.3E+08	5.2E+06	8.4E+07	Various	{T}			
		Screenin	g Levels (µg	/Kg)									
Soil Saturation Concentration Screening Levels (Csat)	Various	NA	NA	NA	NA	NA	NA	NA	Various	NA			
Residential Vapor Intrusion Soil Screening Levels (S _{VI-res})	Various	NL	NL	NL	NL	NL	5,100	6.5E+07	Various	1,900			
Nonresidential Vapor Intrusion Soil Screening Levels (S _{VI-nr})	Various	NL	NL	NL	NL	NL	86,000	1.09E+09	Various	39,000			

Applicable Criterion/RBSL Exceeded

bgs Below Ground Surface (feet)

BOLD Value Exceeds Applicable Criterion/RBSL

<MDL Non-detected at levels above laboratory method detection limit (MDL)

NA Not Applicable

NL Not Listed

NLL Not Likely to Leach

NLV Not Likely to Volatilize

ID Insufficient Data

TABLE 2 SUMMARY OF SOIL ANALYTICAL RESULTS: METALS 24800 HAGGERTY ROAD, FARMINGTON HILLS, MICHIGAN PM PROJECT # 01-6348-0-002

	METALS (μg/Kg)	Arsenic	Barium	Cadmium	Chromium	Copper	Lead	Mercury	Selenium	Silver	Zinc	
Chemical	Abstract Service Numb	er (CAS#)	7440382	7440393	7440439	16065831	7440508	7439921	7439976	7782492	7440224	7440666
Sample ID	Sample Date	Sample Depth (feet bgs)	Michigan Ten Metals									
SB-2	01/27/2016	2.0-3.0	5,150	37,700	400	10,600	19,100	25,300	<50	<400	<200	66,300
SB-3	01/27/2016	4.0-5.0	9,430	90,400	240	12,100	18,300	22,300	62	<400	<200	61,900
A-4 (Co-located SB-3)	01/27/2016	4.0-5.0	3,150	56,600	300	7,460	10,400	19,800	63	<400	<200	35,400
SB-4	01/27/2016	3.0-4.0	2,210	156,000	310	6,410	9,400	11,800	64	<400	<200	35,400
SB-6	01/27/2016	2.0-3.0	2,150	113,000	430	7,850	6,490	15,800	<50	<400	<200	36,100
SB-8	01/27/2016	6.0-7.0	2,800	81,700	230	13,500	20,400	7,090	<50	<400	<200	49,300
SB-10	01/27/2016	1.0-2.0	2,980	28,200	<200	5,850	9,970	8,200	<50	<400	<200	21,700

Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50)

Generic Soil Cleanup Criteria Tables 2 and 3: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 30, 2013
MDEQ Guidance Document For The Vapor Intrusion Pathway, Policy and Procedure Number: 09-017, Appendix D Vapor Intrusion Screening Values, May 2013

		Res	sidential (µg/K	g)		•	_			
Statewide Default Background Levels	5,800	75,000	1,200	18,000	32,000	21,000	130	410	1,000	47,000
Drinking Water Protection (DWP)	4,600	1.30E+06	6,000	30,000	5.80E+06	7.00E+05	1,700	4,000	4,500	2.40E+06
Groundwater Surface Water Interface Protection (GSIP)	4,600	1.2E+06{G}	7,200 {G,X}	6.3E+09	1.6E+05 {G}	7.4E+06 {G,X}	50 (M); 1.2	400	100 {M}; 27	3.6E+05 {G}
Soil Volatilization to Indoor Air Inhalation (SVII)	NLV	NLV	NLV	NLV	NLV	NLV	48,000	NLV	NLV	NLV
Ambient Air Infinite Source Volatile Soil Inhalation (VSI)	NLV	NLV	NLV	NLV	NLV	NLV	52,000	NLV	NLV	NLV
Ambient Air Finite VSI for 5 Meter Source Thickness	NLV	NLV	NLV	NLV	NLV	NLV	52,000	NLV	NLV	NLV
Ambient Air Finite VSI for 2 Meter Source Thickness	NLV	NLV	NLV	NLV	NLV	NLV	52,000	NLV	NLV	NLV
Ambient Air Particulate Soil Inhalation (PSI)	7.20E+05	3.30E+08	1.70E+06	2.60E+05	1.30E+08	1.00E+08	2.00E+07	1.30E+08	6.70E+06	ID
Direct Contact (DC)	7,600	3.70E+07	5.50E+05	2.50E+06	2.00E+07	4.00E+05	1.60E+05	2.60E+06	2.50E+06	1.70E+08
	_	Nonr	residential (µg/	/Kg)						
Drinking Water Protection (Nonres DWP)	4,600	1.30E+06	6,000	30,000	5.80E+06	7.00E+05	1,700	4,000	4,500	5.00E+06
Soil Volatilization to Indoor Air Inhalation (Nonres SVII)	NLV	NLV	NLV	NLV	NLV	NLV	89,000	NLV	NLV	NLV
Ambient Air Infinite Source Volatile Soil Inhalation (Nonres VSI)	NLV	NLV	NLV	NLV	NLV	NLV	62,000	NLV	NLV	NLV
Ambient Air Finite VSI for 5 Meter Source Thickness	NLV	NLV	NLV	NLV	NLV	NLV	62,000	NLV	NLV	NLV
Ambient Air Finite VSI for 2 Meter Source Thickness	NLV	NLV	NLV	NLV	NLV	NLV	62,000	NLV	NLV	NLV
Ambient Air Particulate Soil Inhalation (Nonres PSI)	9.10E+05	1.50E+08	2.20E+06	2.40E+05	5.90E+07	4.40E+07	8.80E+06	5.90E+07	2.90E+06	ID
Direct Contact (Nonres DC)	37,000	1.30E+08	2.10E+06	9.20E+06	7.30E+07	9.0E+5 (DD)	5.80E+05	9.60E+06	9.00E+06	6.30E+08
		Scree	ning Levels (µ	g/Kg)						
Soil Saturation Concentration Screening Levels (Csat)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Residential Vapor Intrusion Soil Screening Levels (S _{V-res})	NL	NL	NL	NL	NL	NL	NL	NL	NL	NL
Nonresidential Vapor Intrusion Soil Screening Levels (S _{VI-nr})	NL	NL	NL	NL	NL	NL	NL	NL	NL	NL

Applicable Criterion/RBSL Exceeded

BOLD Value Exceeds Applicable Criterion/RBSL

bgs Below Ground Surface (feet)

<MDL Non-detected at levels above laboratory method detection limit (MDL)

NA Not Applicable

NL Not Listed

NLL Not Likely to Leach

NLV Not Likely to Volatilize

ID Insufficient Data

{G} Metal GSIP Criteria for Surface Water Not Protected for Drinking Water Use based on 377 mg/L CaCO3 Hardness: Station ID 630002, Minnow Pond Drain, near Farmington Township, MI.

TABLE3 SUMMARY OF GROUNDWATER ANALYTICAL RESULTS: VOCs, PNAs, AND METALS 24800 HAGGERTY ROAD, FARMINGTON HILLS, MICHIGAN PM PROJECT # 01-6348-0-002

VOLATILE ORGANIC COMPOUNDS (VOCs), POLYNUCLEAR AROMATIC HYDROCARBONS (PNAs), AND METALS (μg/L)					PNAs	Arsenic	Barium	Cadmium	Chromium	Copper	Lead	Mercury	Selenium	Silver	Zinc
	Chemical Abstract Service Number (CAS#)					7440382	7440393	7440439	16065831	7440508	7439921	7439976	7782492	7440224	7440666
Sample ID	Sample Date	Screen Depth (feet bgs)	Depth to Groundwater (feet bgs)	VOCs	PNAs	Michigan Ten Metals									
TMW-1	01/27/2016	7.25-12.25	8.65	ND	ND	30	375	<0.5	<5	<5	<3	<0.2	<5	<0.5	<5
TMW-3	01/27/2016	7.75-12.75	8.27	ND	ND	6	916	<0.5	<5	<5	<3	<0.2	<5	<0.5	<5
TMW-5	01/27/2016	6.50-11.50	6.81	ND	ND	16	223	<0.5	<5	<5	<3	<0.2	<5	<0.5	35
A-5 (Co-located TMW-5)	01/21/2016	0.50-11.50	0.61	ND	ND	15	219	<0.5	<5	<5	<3	<0.2	<5	<0.5	15
TMW-7	01/27/2016	5.00-10.00	6.60	ND	ND	8	43	<0.5	<5	<5	<3	<0.2	<5	<0.5	<5
TMW-9	01/27/2016	8.00-13.00	8.40	ND	ND	3	207	<0.5	<5	<5	<3	<0.2	<5	<0.5	18

Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50)

Generic Groundwater Cleanup Criteria Table 1: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 30, 2013 MDEQ Guidance Document For The Vapor Intrusion Pathway, Policy and Procedure Number: 09-017, Appendix D Vapor Intrusion Screening Values, May 2013

MDEQ Guidance Document For The Vapor Intrusion Pathway, Policy and Procedure Number: 09-017, Appendix D Vapor Intrusion Screening Values, May 2013														
Residential/Nonresidential (μg/L) Residential Drinking Water (Res DW) Various Various 10 {A} 2,000 {A} 5.0 {A} 100 {A} 1,000 {E} 4.0 {L} 2.0 {A} 50 {A} 34 2,400														
Residential Drinking Water (Res DW)	Various	Various	10 {A}	2,000 {A}	5.0 {A}	100 {A}	1,000 {E}	4.0 {L}	2.0 {A}	50 (A)	34	2,400		
Residential Health Based Drinking Water Values	Various	Various	NL	NL	NL	NL	1,400 {E}	NL	NL	NL	NL	NL		
Nonresidential Drinking Water (Nonres DW)	Various	Various	10 {A}	2,000 {A}	5.0 {A}	100 {A}	1,000 {E}	4.0 {L}	2.0 {A}	50 {A}	98	5,000 {E}		
Nonresidential Health Based Drinking Water Values	Various	Various	NL	NL	NL	NL	4,000 {E}	NL	NL	NL	NL	NL		
Groundwater Surface Water Interface (GSI)	Various	Various	10	1,800 {G}	6 {G,X}	220	28 {G}	42 {G,X}	0.0013	5.0	0.2 {M}; 0.06	360 {G}		
Residential Groundwater Volatilization to Indoor Air Inhalation (Res GVII) ¹	Various	Various	NLV	NLV	NLV	NLV	NLV	NLV	56 (S)	NLV	NLV	NLV		
Nonresidential Groundwater Volatilization to Indoor Air Inhalation (Nonres GVII) 1	Various	Various	NLV	NLV	NLV	NLV	NLV	NLV	56 (S)	NLV	NLV	NLV		
		Sc	reening Level	s (µg/L)										
Residential Groundwater Vapor Intrusion Screening Levels (GW _{VI-res}) ²	Various	Various	NL	NL	NL	NL	NL	NL	ID	NL	NL	NL		
Nonresidential Groundwater Vapor Intrusion Screening Levels (GW _{VI-nr}) ²	Various	Various	NL	NL	NL	NL	NL	NL	ID	NL	NL	NL		
Residential Vapor Intrusion Shallow Groundwater Screening Levels (GW _{VI-sump-res}) ³	Various	Various	NL	NL	NL	NL	NL	NL	ID	NL	NL	NL		
Nonresidential Vapor Intrusion Shallow Groundwater Screening Levels (GW _{VI-sump-nr}) ³	Various	Various	NL	NL	NL	NL	NL	NL	ID	NL	NL	NL		
Water Solubility	Various	Various	NA	NA	NA	NA	NA	NA	56	NA	NA	NA		
Flammability and Explosivity Screening Level	Various	Various	ID	ID	ID	ID	ID	ID	ID	ID	ID	ID		
Acute Vapor Intrusion Screening Levels for Groundwater (µg/L)														
IRASL Groundwater (AGW _{vi})	Various	Various	NL	NL	NL	NL	NL	NL	NL	NL	NL	NL		
IRASL Groundwater In Contact With Structure (AGW _{vi-sump})	Various	Various	NL	NL	NL	NL	NL	NL	NL	NL	NL	NL		

Applicable Criteria/RBSL Exceeded

BOLD Value Exceeds Applicable Criteria

bgs Below Ground Surface (feet)

ND Not detected at levels above the laboratory Method Detection Limit (MDL) or Minimum Quantitative Level (MQL)

¹ Tier 1 GVII Criteria based on 3 meter (or greater) groundwater depth

² (2013 Vapor Intrusion Guidance) Screening Levels based on depth to groundwater less than 1.5 meters and not in contact with building foundation

³ (2013 Vapor Intrusion Guidance) Screening levels based on groundwater in contact with the building foundation or within a sump

NA Not Applicable

NL Not Listed

NLL Not Likely to Leach

NLV Not Likely to Volatilize

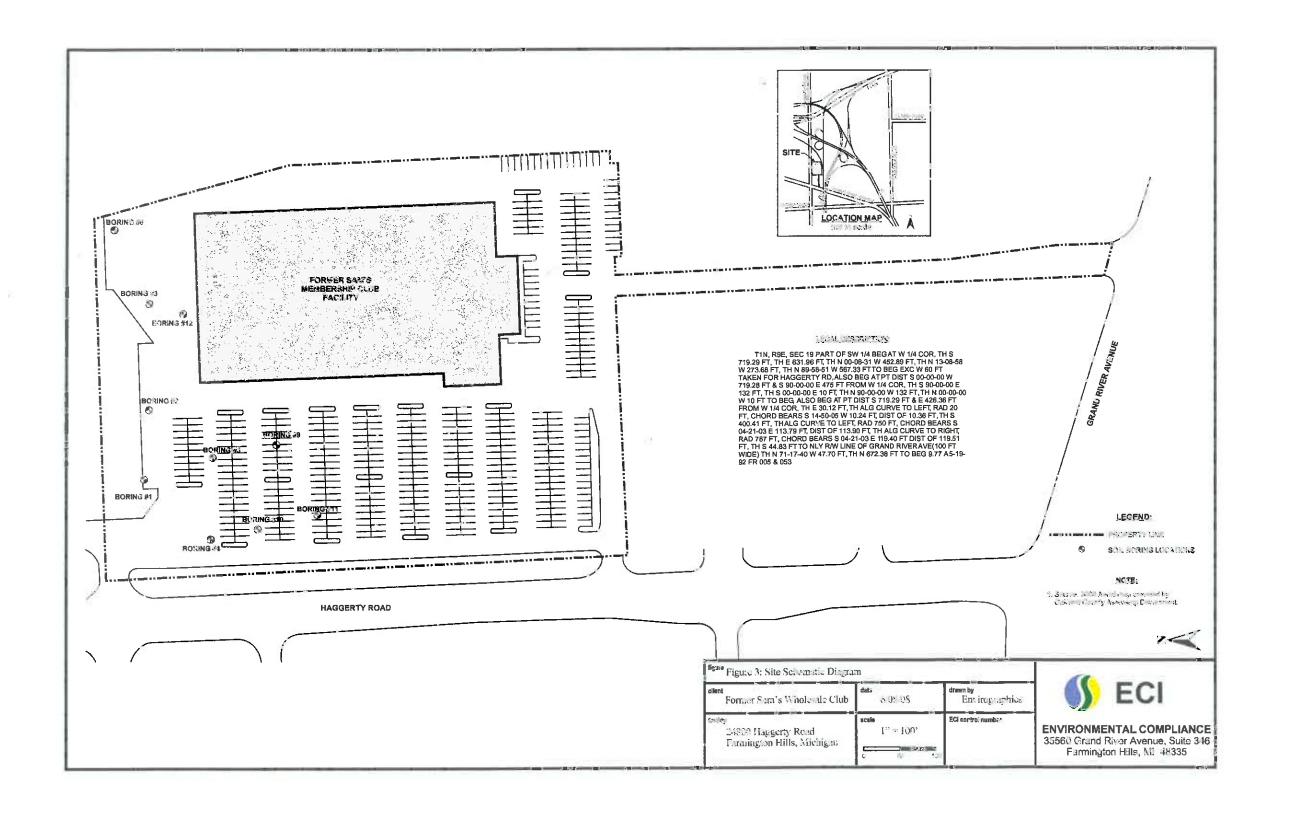
ID Insufficient Data

{G} Metal GSI Criteria for Surface Water Not Protected for Drinking Water Use based on

377 mg/L CaCO3 Hardness: Station ID 630002, Minnow Pond Drain, near Farmington Township, MI.

Appendix A





Shaded cells indicate the criteria exceeded.

					Site/Facilit	y/Incident Forme	er Sam's Cl	ub			-					
				Soil: Reside	ential and Commerc	lal I. Part 201 Gener	art 201 Generic Cleanup Criteria and Screening Levels; Part 213 Tier 1 Risk-Based Screening Levels (RBSLs)									
		Ī			Groundwat	er Protection		Indoor Air		Source size	modifier: 0.3	5	Direct	Contact		
Laboratory Results			Statewide Default Back ground Levels	Drinking Water Protection and RBSLs	Groundwater Surface Water Interface Protection Criteria and RBSLs (may not be protective for Drinking Water Sources) (1)	Groundwater Surface Water Interface Protection Criterla and RBSLs (protective for Drinking Water Sources) (1)	Groundwater Contact Protection Criteria and RBSLs	Soll Volatilization to Indoor Air inhalation Criteria and RBSLs	Infinite Source Volatile Soli Inhalation Criteria (VISC) and RBSLs	Finite VSIC for 5 Meter Source Thickness	Finite VSIC for 2 Meter Source Thickness	Particulate Soil Inhalation Criteria and RBSLs	Direct Contact Criteria and RBSLs	Soll Saturation Concentration Sceening Levels		
B12-5/1/2008 12:00				1	<u> </u>	<u> </u>										
Parameter	Results (ug/Kg)	Qual						<u> </u>	NLV	- NIL /	NLV	1.0E+8	4.0E+5	NA NA		
Lead (B)	38,000		77.77	7.0E+5	(G,X)	CALC	ID	NLV		NLV	NLV	ID ID	1.7E+8	NA NA		
Zinc (B)	58,000		aront	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	<u> </u>	1./5+6	NA NA		
B2-1 Soil @6ft-5/1/2008 10:00:00 AM												ì				
Parameter	Results (ug/Kg)	Qual					<u> </u>				N11.12	7.2E+5	T.600	NA NA		
Arsenic	11,000		3,900	5800	70,000 (X)	23,000	2.0Ε+6	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7	NA NA		
Barium (B)	96,000		75.00	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	I	3.7E+7 1.7E+8	NA NA		
Zinc (B)	58,000	J.	47 200	2,4E+6	(G)		1.0E+9 (D)	NLV	NLV_	NLV	NLV	ID.	1./E+8	NA NA		
B2-2 3.5ft Soil-5/1/2008 12:00																
Parameter	Results (ug/Kg)	Qual		al .	<u> </u>							3.3E+8		NA NA		
Barium (B)	140,000		78,000	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7 1.7E+8	NA NA		
Zinc (B)	55,000		47,650	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	U	1./E+8	NA		
B3-1 Soil @7ft-5/1/2008 12:00	•	1														
Parameter	Results (ug/Kg)	Qual			31			<u> </u>						NA NA		
Arşenic	6,500	"	9,65	6010	70,000 (X)	23,000	2.0E+6	NLV	NLV	NLV	NLV	7.2E+5	7,600			
Barium (B)	160,000		15,003	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7	NA NA		
Copper (B)	39,000		ATT. (980)	5.8E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	1.3E+8	2.0E+7			
Lead (B)	54,000		21 000	7.0E+5	(G,X)	CALC	ID.	NLV	NLV	NLV	NLV	1.0E+8	4.0E+5	NA NA		
Mercury, Total	180		1170	1,700	130 VMH 1-8		47,000	48,000	52,000	52,000	52,000	2.0E+7	1.6E+5	NA NA		
Naphthalene	2,200		NA.	·	170		2.1E+6	2.5E+5	3.0E+5	3.0E+5	3.0E+5	2.0E+8	1.6E+7			
Selenium (B)	1,700		1650	4,000	410.		7.8E+7	NLV	NLV	NLV	NLV	1.3E+8	2.6E+6	NA 14545		
1,2,4-Trimethylbenzene (I)	1,900		NA	2,100	924		1.1E+5 (C)	1.1E+5 (C)	2.1E+7	5.0E+8	5.0 E +8	8.2E+10	1.1E+5 (C)	1.1E+5 NA		
Zinc (B)	150,000		107,060	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	ļ	1.7E+8	NA		
B4-1 Soil @3-4ft-5/1/2008 12:00																
Parameter	Results (ug/Kg)	Qual		ex.	<u> </u>					<u> </u>	<u> </u>		100.0			
Lead (B)	22,000	<u> </u>	\$1,900	7.0E+5	(G,X)	CALC	ID	NLV	NLV	NLV	NLV	1.0E+8	4.0E+5	NA NA		
Zinc (B)	52,000		87,000	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	ID	1.7E+8	NA.		
B5-1 Soil @3-4ft-5/1/2008 12:00				-						ļ						
Parameter	Results (ug/Kg)	Qual					<u> </u>	4				+	0.75 - 7	LIA .		
Barium (B)	89,000		75.650	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7	NANA		

Shaded cells indicate the criteria exceeded.

					Site/Facilit	ly/Incident For	mer Sam's Clu	ıb				
			Ground	water: Residentia	l and Industrial-C	ommercial Part 2	01 Generic Clean	up Criteria and S	creening Levels; Part	213 Tier Risk-Based	Screening levels	(RB\$Ls)
Laboratory Results			Residential and Commercial I DW Criteria And RBSLs	Industrial and Commercial II, III,IV Drinking Water Criteria and RSBLs		Groundwater Surface Water Interface Criteria And RBSLs (protective of DW)	Residential and Commercial I Groundwater Volatilization to Indoor Air Inhalation Criteria and RBSLs	Industrial and Commercial II III and IV Groundwater Volatilization to Indoor Air Inhalation Criteria and RBSLs	Groundwater Contact Criteria and RBSLs	Water Solubility	Flammability and Explosivity Screening Level	Acute Inhalation Screening Levei
TMW1 Water (14ft)-5/1/2	2008 12:00			Τ				 				
Parameter	Result	Qual										
Arsenic	2.	4	10-(A)	10 (A)	150 (X)	50	NLV	NLV	4,300	NA NA	ID	ID
TMW12 Water (14ft)-5/1	/2008 12:00										5 1	
Parameter	Result	Qual						<u> </u>				
Arsenic	6:	2	19(60)	10 (A)	150 (X)	96	NLV	<u> </u>	4,300	NA	ID	ID
Chromium, Total	1:	3	100 (A)	100 (A)	10		NLV	NLV	4.6E+5	NA	<u> </u>	ID .
Lead (B)	8.	1	+0.03	4.0 (L)	(G,X)	14 CALC	NLV	NLV	ID	NA NA	ID.	ID
TMW2 Water (14ft)-5/1/2	2008 12:00		-								1	
Parameter	Result	Qual									<u> </u>	·
Arsenic	1:	2	10.592	19 (6)	150 (X)	50	NLV	NLV	4,300	NA	ID.	ID.
TMW3 Water (14ft)-5/1/2	2008 12:00							T				
Parameter	Result	Qual										ID
Arsenic	5	D	10.54)	10 (A)	150 (X)	50	NLV	NLV	4,300	NA	ID.	
TMW4 Water (14ft)-5/1/2	2008 12:00								!			
Parameter	Result	Qual									1D	ID.
Arsenic	1	1	10 (A)	16.(A)	150 (X)	50	NLV	NLV	4,300			iD
Chromium, Total	1:	3	100 (A)	100 (A)	- 10		NLV	NLV	4.6E+5	NA NA		
Lead (B)	7.:	5	4.5 (1.3	4004	(G,X)	14 CALC	NLV	NLV	ID	NA NA	ID	1D
TMW5 Water (14ft)-5/1/2	2008 12:00											
Parameter	Result	Qual			L							- ID
Arsenic	2:	3	10 (6)	(18.66)	150 (X)	50	NLV	·	4,300	NA		
Lead (B)	5.	4	40(12	4910	(G,X)	14 CALC	NLV	NLV	ID	NA NA	ID	ID.
TMW8 Water (14ft)-5/1/2	2008 12:00							3				
Parameter	Result	Qual						<u> </u>			ID	ID
Arsenic	2	4	10 (A)	101A)	150 (X)	50	NLV			NA NA	dt.	D
Lead (B)	4.	2	6.0 (6.1	#004	(G,X)	14 CALC	NLV	NLV	ID	NA	ID.	D

Darker or blue shaded cells for the criteria indicate the chemical was found at a concentration that exceeds at least one criterion. Lighter or yellow shaded cells indicate the compound was not detected, but the reporting limit was above the criteria.

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			Soll: Residential and Commercial I. Part 201 Generic Cleanup Criteria and Screening Levels; Part 213 Tier 1 Risk-Based Screening Level										Levels (RBSLs)		
		ı			Groundwate	r Protection		Indoor Air		Source si	ze modifier: 0.3	35	Direct	Contact		
Laboratory Results			Statewide Default Background Levels	Default Background	Default Background	Drinking Water Protection Criteria and RBSLs	Groundwater Surface Water Protection Criteria and RBSLs (may not be protective for Drinking Water Sources) (1)	Groundwater Surface Water Protection Criteria and RBSLs (protective for Drinking Water Sources) (1)	Groundwater Contact Protection Criteria and RBSLs	Soil Volatilization to Indoor Air Inhalation and RBSLs	Infinite Source Volatile Soli Inhalation Criteria (VISC) and RBSLs	Finite VSIC for 5 Meter Source Thickness	Finite VSIC for 2 Meter Source Thickness	Particulate Soil Inhalation Criteria and RBSLs	Direct Contact Criteria and RBSLs	Soil Saturation Concentration Sceening Level
B10 Sandy Soil (5-6ft)-5/1/2008 12:	00			<u></u>					l					<u> </u>		
<u>Metals</u>					1											
Parameter	Result (ug/Kg)	Qual			10						1		<u> </u>			
Агѕепіс	6,000		3.800	3820	70,000 (X)	23,000	2.0E+6	NLV	NLV	NLV	NLV	7.2E+5	7,600	N		
Barlum (B)	19,000		75,000	1.3E+6	(G,X)	ÇALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7	N		
Cadmium (B)	81		1,200	6,000	(G,X)	CALC	2.3E+8	NLV	NLV	NLV	NLV	1.7E+6	5.5E+5	N		
Chromium, Total	9,500		18,000 (total)	30,000	18000		1.4E+8	NLV	NLV	NLV	NLV	2.6E+5	2.5E+6	N		
Copper (B)	14,000		32,000	5.8E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	1.3E+8	2.0E+7	N		
Lead (B)	5,100		21,000	7.0E+5	(G,X)	CALC	I D	NLV	NLV	NLV	NLV	1.0E+8	4.0E+5	N		
Mercury, Total	< 50		130	1,700	130 (M); 1.2		47,000	48,000	52,000	52,000	52,000	2.0E+7	1.6E+5	N		
Selenium (B)	210	T	410	4,000	410		7.8E+7	NLV	NLV	NLV	NLV	1.3E+8	2.6E+6	<u>N</u>		
Silver (B)	< 100		1,000	4,500	1000 (M); 27		2.0E+8	NLV	NLV	NLV	NLV	6.7E+6	2.5E+6	N		
Zinc (B)	24,000	T	47,000	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	ID	1.7E+8	N		
B11 Sandy Soil (4-5ft)-5/1/2008 12:	00								-	,			i i			
Metals	<u></u>										†		 -			
Parameter	Result (ug/Kg)	Qual														
Arsenic	1,900		5,800	5800	70,000 (X)	23,000	2.0E+6	NLV	NLV	NLV	NLV	7.2E+5	7,600	N.		
Barium (B)	6,100		75,000	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV	NLV	NLV	NLV	3.3E+8	3.7E+7	N.		
Cadmium (B)	77		1,200	6,000	(G,X)	CALC	2.3E+8	NLV	NLV	NLV	NLV	1.7E+6	5.5E+5	N.		
Chromium, Total	5,000	 	18,000 (total)	30,000	18000		1.4E+8	NLV	NLV	NLV	NLV	2.6E+5	2.5E+6	N		
Copper (B)	8,600	 	32,000	5.8E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	1.3E+8	2.0E+7	N		
Lead (B)	3,100		21,000	7.0E+5	(G,X)	CALC	ID	NLV	NLV	NLV	NLV	1.0E+8	4.0E+5	N		
Mercury, Total	< 50		130	1,700	130 (M); 1.2		47,000	48,000	52,000	52,000	52,000	2.0E+7	1.6E+5	N.		
Selenium (B)	340	 	410	4,000	410		7.8E+7	NLV	NLV	NLV	NLV	1.3E+8	2.6E+6	N		
Silver (B)	< 100	 	1,000	4,500	1000 (M); 27		2.0E+8	NLV	NLV	NLV	NLV	6.7E+6	2.5E+6	N		
Zinc (B)	15,000	 	47,000	2.4E+6	(G)	-	1.0E+9 (D)	NLV	NLV	NLV	NLV	ID	1.7E+8			
			41,000	2.7610	(0)		(D)	1454	1454	1124	1	 	1			
B6-1 Sandy Soll (6ft)-5/1/2008 12:0	<u> </u>												<u> </u>			
Metals																
Parameter	Result (ug/Kg)	Qual			70 000 00		0.05.0	- NIX			NLV	7.2E+5	7,600	N		
Arsenic (D)	3,600		5,800	5800	70,000 (X)	23,000	2.0E+6	NLV	NLV NLV	NLV NLV	NLV NLV	7.2E+5 3.3E+8	3.7E+7	<u>N</u>		
Barium (B)	22,000	ļ <u>.</u>	75,000	1.3E+6	(G,X)	CALC	1.0E+9 (D)	NLV			NLV	3.3E+6 1.7E+6	5.5E+5	N		
Cadmium (B)	130		1,200	6,000	(G,X)	ÇALC	2.3E+8	NLV	NLV	NLV	NLV NLV	1.7E+6 2.6E+5		N		
Chromium, Total	11,000	ļ -	18,000 (total)	30,000	18000		1.4E+8	NLV	NLV	NLV	NLV NLV	2.6E+5 1.3E+8	2.5E+6 2.0E+7			
Copper (B)	12,000	L	32,000	5.8E+6	(G)		1.0E+9 (D)	NLV	NLV NLV	NLV NLV	NLV	1.3E+8 1.0E+8	2.0E+7 4.0E+5	N N		
Lead (B)	6,800		21,000	7.0E+5	(G,X)	CALC	ID.	NLV				1.0E+8 2.0E+7	4.0E+5			
Mercury, Total	< 50		130	1,700	130 (M); 1.2		47,000	48,000	52,000	52,000	52,000			N		
Selenium (B)	< 200		410	4,000	410		7.8E+7	NLV	NLV	NLV	NLV	1.3E+8	2.6E+6	N		
Silver (B)	< 100	ļ	1,000	4,500	1000 (M); 27	·	2.0E+8	NLV	NLV	NLV	NLV	6.7E+6	2.5E+6	N		
Zinc (B)	36,000		47,000	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	ID ID	1.7E+8	<u>_</u>		
B9 Sandy Soll (7-8ft)-5/1/2008 12:00	0				!						-	ļ	<u> </u>			
Metals Parameter	Result (un/Kn)	Oust														
Parameter	Result (ug/Kg)	Qual	E 200	EQAA	70 000 (Y)	23 000	3 UE+6	NI V	NI V	NIV	NIV	7 2F+5	7 600			
	Result (ug/Kg) 2,300 13,000	Qual	5,800 75,000	5800 1.3E+6	70,000 (X) (G,X)	23,000 CALC	2.0E+6 1.0E+9 (D)	NLV NLV	NLV NLV	NLV NLV	NLV NLV	7.2E+5 3.3E+8	7,600 3.7E+7	N N		

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			<u> </u>	Soil: Res	dential and Co	ommercial I. Pa	rt 201 Generic	Cleanup Crite	ria and Screeni	ng Levels; Par	t 213 Tier 1 Ris	k-Based Screening	Levels (RBSLs)
					Groundwater Protection					Source si	ze modifier: 0.3	35	Direct Contact	
Laboratory Results		Statewide Default Background Levels	Drinking Water Protection Criteria and RBSLs	Groundwater Surface Water Protection Criteria and RBSLs (may not be protective for Drinking Water Sources) (1)	Groundwater Surface Water Protection Criteria and RBSLs (protective for Drinking Water Sources) (1)	Groundwater Contact Protection Criteria and RBSLs	Soil Volatilization to Indoor Air Inhalation and RBSLs	Infinite Source Volatile Soil Inhalation Criteria (VISC) and RBSLs	Finite VSIC for 5 Meter Source Thickness	Finite VSIC for 2 Meter Source Thickness	Particulate Soil Inhalation Criteria and RBSLs	Direct Contact Criteria and RBSLs	Soil Saturation Concentration Sceening Levels	
B9 Sandy Soli (7-8ft)-5/1/2008 1	2:00				 				<u>- </u>					
<u>Metals</u>			1											
Parameter	Result (ug/Kg)	Qual									į			
Chromium, Total	4,300	1	18,000 (total)	30,000	18000		1.4E+8	NLV	NLV	NLV	NLV	2.6E+5	2.5E+6	NA.
Copper (B)	6,500		32,000	5.8E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	1.3E+8	2.0E+7	NA_
Lead (B)	2,900		21,000	7.0E+5	(G,X)	CALC	ID	NLV	NLV	NLV	NLV	1.0E+8	4.0E+5	NA NA
Mercury, Total	< 50	T	130	1,700	130 (M); 1.2		47,000	48,000	52,000	52,000	52,000	2.0E+7	1.6E+5	NA NA
Selenium (B)	210		410	4,000	410		7.8E+7	NLV	NLV	NLV	NLV	1.3E+8	2.6E+6	NA
Silver (B)	< 100	T	1,000	4,500	1000 (M); 27		2.0E+8	NLV	NLV	NLV	NLV	6.7E+6	2.5E+6	NA NA
Zinc (B)	16,000	1	47,000	2.4E+6	(G)		1.0E+9 (D)	NLV	NLV	NLV	NLV	ID	1.7E+8	NA

Some criteria in the table may show two values with a footnote (M). This occurs when the calculated criterion for the respective land use and pathway is below the target detection limit or TDL (see OM#2, Attachment 1 and foonote M in OM#1, Attachment 1.). In such cases the criterion defaults to the TDL. The first value is the default criterion and the last value the calculated criterion.

More than one result may be reported by the laboratory for the same parameter. (different methods are used for the same parameter)

A ph of 7 and hardness of 100 were used to calculate GSI generic criteria for some parameters

Valence-specific chromium data (Cr III and IV) shall be compared to the corresponding valence-specific cleanup criteria. If both Cr III and Cr VI are present in groundwater, the total concentration of both cannot exceed the drinking water criterion of 100 ug/L. If janalytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI. Cr III soil cleanup criterion for protection of drinking water can only be used at sites where groundwater is prevented from being used as a public water supply, currently and in the future, through an approved land or resource use restriction.

Statewide defaults for metals and cyanide were used to replace some criteria.

Some criteria in the table may show two values with a footnote (M). This occurs when the calculated criterion for the respective land use and pathway is below the target detection limit or TDL (see OM#2, Attachment 1 and foonote M in OM#1, Attachment 1.). In such cases the criterion defaults to the TDL. The first value is the default criterion and the last value the calculated criterion.

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Darker or blue shaded cells for the criteria indicate the chemical was found at a concentration that exceeds at least one criterion. Lighter or yellow shaded cells indicate the compound was not detected, but the reporting limit was above the criteria Site/Facility/Incident Former Sam's Club

	Site/Facility/incident Former Sam's Cide															
				Groundy	vater: Residentia	r: Residential and Industrial-Commercial Part 201 Generic Cleanup Criteria and Screening Levels; Part 213 Tier Risk-Based Screening levels (RBSLs)										
Criteria And RBSLs					mercial I Commercial II, And RBSLs (may And RBSLs May And RBSLs III, IV Drinking Water III, IV Drinking Water And RBSLs And RBSLs Indoor Air Indoor		Groundwater Contact Criteria and RBSLs	Water Solubility	Flammability and Explosivity Screening Level	Acute Inhalation Screening Level						
SAMPLE:	B2-1 Soll @6ft-5/1/2008	10:00:00 AM							'							
Metals			_							,						
	Parameter	Ļ.,,	Qual.				4 000 044 0	NLV	NLV	1,4E+7	NA	ID	ID			
Barium (B)		390		2,000 (A)	2,000 (A)	(G,X)	1,900 CALC		NLV.	4.6E+5	NA NA	ID	ID			
Chromium,	Total	13		100 (A)	100 (A)	- 11	L <u>_</u>	NLV	NLV	7.4E+6	NA NA	ID	ID			
Copper (B)		11		1,000 (E)	1,000 (E)	(G)		NLV	NLV	7.4L10	NA	ID	ID			
Lead (B)		5	5	1011	1 1 1	(G,X)	14 CALC	NLV	NLV	ID I	105					
SAMPLE:	B3-1 Soil @7ft-5/1/2008	12:00									'					
Metals) ————————————————————————————————————							1		1						
	Parameter	Result (ug/L)	Qual.]						4,300	NA NA	ID	1D			
Arsenic	<u></u>	6.7	Ī	10 (A)	10 (A)	150 (X)		NLV	NLV	4,300 l	NA NA	- ID				
Barium (B)		370		2,000 (A)	2,000 (A)	(G,X)	1,900 CALC	NLV	NLV		NA NA	in in	in			
Chromium,	Total	12		100 (A)	100 (A)	H H		NLV	NLV	4.6E+5	NA NA	L				
Copper (B)		15		1,000 (E)	1,000 (E)	(G)		NLV	NLV	7.4E+6	NA NIA		<u>in</u>			
Lead (B)		13		20(0	(444)	(G,X)	14 ÇALC	NLV	NLV	10	NA	ID ID				
Zinc (B)		250		2,400	5,000 (E)	(G)		NLV	NLV	1.1E+8	NA		<u>_</u>			

Total concentrations must be used when possible for comparisons to cleanup criteria and RBSLs. The use of dissolved constituents for comparison to criteria must be approved by the RRD.

Some criteria in the table may show two values with a footnote (M). This occurs when the calculated criterion for the respective land use and pathway is below the target detection limit or TDL (see OM#2, Attachment 1 and foonote M in OM#1, Attachment 1.). In such cases the criterion defaults to the TDL. The first value is the default criterion and the last value the calculated criterion.

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A ph of 7 and hardness of 100 were used to calculate GSI generic criteria for some parameters

Valence-specific chromium data (Cr III and IV) shall be compared to the corresponding valence-specific cleanup criteria. If both Cr III and Cr VI are present in groundwater, the total concentration of both cannot exceed the drinking water criterion of 100 ug/L. If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI. Cr III soil cleanup criterion of drinking water can only be used at sites where groundwater is prevented from being used as a public water supply, currently and in the future, through an approved land or resource use restriction.

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Some criteria in the table may show two values with a footnote (M). This occurs when the calculated criterion for the respective land use and pathway is below the target detection limit or TDL (see OM#2, Attachment 1 and foonote M in OM#1, Attachment 1.). In such cases the criterion defaults to the TDL. The first value is the default criterion and the last value the calculated criterion.

More than one result may be reported by the laboratory for the same parameter. (different methods are used for the same parameter)

A ph of 7 and hardness of 100 were used to calculate GSI generic criteria for some parameters

Valence-specific chromium data (Cr III and IV) shall be compared to the corresponding valence-specific cleanup criteria. If both Cr III and Cr VI are present in groundwater, the total concentration of both cannot exceed the drinking water criterion of 100 ug/L. If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI. Cr III soil cleanup criterion for protection of drinking water can only be used at sites where groundwater is prevented from being used as a public water supply, currently and in the future, through an approved land or resource use restriction.